



## **PHS MoU Group**

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October 19, 2001

### **Comments On 3G Further Notice of Proposed Rule Making Dockets 00-258, 95-18, 99-81**

The PHS MoU Group is an international open association of equipment manufacturers and operators of wireless systems using the PHS protocol, Japan Standard RCR STD-28 established by the Association of Radio Industries and Businesses (ARIB). The PHS MoU Group is dedicated to the diffusion of PHS wireless technology worldwide. This technology has been widely deployed in Japan and, more recently, has become extremely popular in Asia as a mechanism to rapidly and cost effectively deploy local telephone service. The PHS MoU group thanks the Commission for this opportunity to comment on this proceeding.

Our primary interest in this proceeding is in the Unlicensed PCS spectrum between 1910 and 1920Mhz. At the meeting of Commission of Inter-American Telecommunications (CITEL) Permanent Consultative Committee I (PCC.I) held in Buenos Aires, Argentina from October 25 through 29, 1999 a document known as the Coordinated Standard Document (CSD) covering PHS technology, as well as other technologies, was approved. The CSD that includes PHS technology can be referred to by CITEL members (regulators/operators) as the applicable worldwide standards for systems which operate in the 1910-1930 MHz bandwidth. The allocation of frequencies within the 1910-1930 MHz band had been recommended by CITEL PCC.III in September 1997 for any of the following applications: a) Fixed Wireless Access (FWA), b) low mobility wireless access, c) low-power voice and data application Personal Communications Service (PCS), or d) combination of these applications.

Adopting rule changes in the US that will allow for the deployment of PHS, or other technologies, for these applications will further harmonize the US spectrum map with that of the remainder of the Americas and should help both US consumers as well as US exporters.

The PHS MoU Group requests that the FCC separate the rule making for the 1910 – 1920MHz band from the more complex remainder of the 3G proceeding and immediately take steps toward harmonization across the Americas through the relaxation of the current Unlicensed PCS etiquette requirements as well as through a modest relaxation of spectral density power limits as currently specified for the band.

Respectfully,

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Chairman of PHS MoU Group